

Trust Board - 30th July 2024

# FREEDOM TO SPEAK UP - ANNUAL REPORT, 2023 - 2024

#### **Purpose:**

To update the Board on Speaking Up initiatives related to raising concerns and to provide assurance that concerns raised are effectively managed in line with current best practices. It also provides assurance in both of these areas by assessing the effectiveness of the FTSU guardian's efforts in supporting staff members who speak up and in fostering a culture of open communication. It aims to demonstrate that speaking up is valued and that the trust is committed to addressing concerns in a timely and appropriate manner.

# **Background and Context**

#### 'Together we are making speaking up business as usual' – Speaking Up Culture.

In response to the Mid-Staffordshire NHS Foundation Trust, The Francis Inquiry <u>report</u>, sets out 20 Principles and Actions which aim to create the right conditions for NHS staff to speak up. These initiatives led to the establishment of Freedom to Speak Up Guardians (FTSUGs). There are over 800 Guardians operate across various healthcare sectors in England under the coordination of the National Guardian's Office. Annually, Guardians receive more than 20,000 contacts. A crucial component of the <u>NHS People Plan</u> lies in its seven 'promises' of values and behaviours. Promises 1, 3, and 5 underscore the significance of fostering a robust culture of speaking up and enabling staff to feel confident to speak up when things go or may go wrong; a key element to ensure a safe and effective working environment..

Leicestershire Partnership Trust is committed to creating high quality, compassionate care and wellbeing for all. Our Chief Executive is the lead Director for Freedom to Speak Up, which signals to staff the importance the organisation places on speaking up about patient care, quality improvement and resolving work related issues. Staff are encouraged initially, to speak up and raise concerns with their line manager, with another member of the leadership teams or directly with a Freedom to Speak Up (FTSU) Guardian. The FTSU Guardian's provide confidential and impartial advice, or practical support where requested.

The Freedom to Speak Up: Speak Up, Listen Up, Follow Up <u>policy</u> provides detailed information about the structure and processes of the Speaking Up service. It aligns with current guidance from NHS Improvement & NHS England.

The Policy identifies a variety of ways or different routes in which staff can speak up within the Trust in addition to the manager, senior leadership team or FTSU Guardian, for example, the Chaplaincy 'Listening Ear' service, AMICA counselling services, Occupational Health service, Human Resources, Patient Safety Team and Staff-side services. In addition, the policy also identifies the non-executive director with responsibility for FTSU, and other external mechanisms such as Care Quality Commission, professional bodies and the National Whistleblowing helpline.

An essential part of the Freedom to Speak Up process is to ensure that the people who speak up receive feedback on how their issue is being managed or addressed e.g., who is responding to the matter, what they have found, is there any wider learning or opportunities for service improvements and what specific actions are being taken (recognising confidentiality issues as appropriate). Feedback is seen as a significant phase of a learning and improving culture and therefore the ongoing response when someone speaks up supports the development of trusting relationships, builds confidence in the speaking up process and promotes a positive speaking up culture. Encouraging speaking up and supporting colleagues who do speak up is a common thread through all five of the Trust's Leadership Behaviours.

Ensuring that people who speak up do not experience detriment is a significant commitment of the Guardian's role and staff are regularly reminded that they should not tolerate any negative consequences of their speaking up. The



policy provides assurance to staff and explicitly states that harassment or victimisation of anyone raising a concern, or any form of reprisal will not be tolerated. When a case has been closed, FTSU Guardian's take the opportunity to ensure that the staff member does not feel they had suffered any disadvantageous or demeaning treatment as a result of speaking up, and we asked them – "Given your experience, would you 'speak up' again". This information is included in the quarterly data submissions to the National Guardians Office.

The Trust has prioritised 'psychological safety' as one of the key features of the 'Our Future, Our Way' culture programme. Freedom to Speak Up Team are active stakeholders in this programme working collaboratively with Patient Safety teams, Equality, Diversity and Inclusion service, Health and Wellbeing team, Organisational Development service, Human Resources team and wider staff support networks. This programme is facilitated by the designated Change Leaders and supported through the named Executive and Non-Executive sponsors.

There is ongoing work in the trust to remove barriers for all workers who want to speak up. This includes strengthening staff support networks, proactive engagement and being Together Against Racism, the introduction of Patient Safety Incident Response Framework, values and leadership behaviours culture work supporting professional relationships, and various other work streams for example, Zero Tolerance to Abuse, Sexual Safety Charter and the Active Bystander programme.

**Internal Independent Audit – 360 assurance** – During July and August of 2023 an independent audit was undertaken to provide an independent assurance opinion on the arrangements in place for meeting FTSU requirements within thrust. The final report was published in October 2023 and all recommendations have been included within the FTSU Action Log. The log is closely monitored in collaboration with Managing Director and to date all actions from the report have been completed and the learning has been taken forward.

What Does the NHS Staff Survey Tell Us About Speaking Up in LPT? (Overall, 2023 response rate 54%).

There are 4 questions within the annual NHS Staff Survey which relate to Speaking Up. The survey aligns with the People Promise, which outlines the aspects that would improve staff working experiences. \*Compassion and inclusivity \*Having a voice that counts \* Continuous learning:

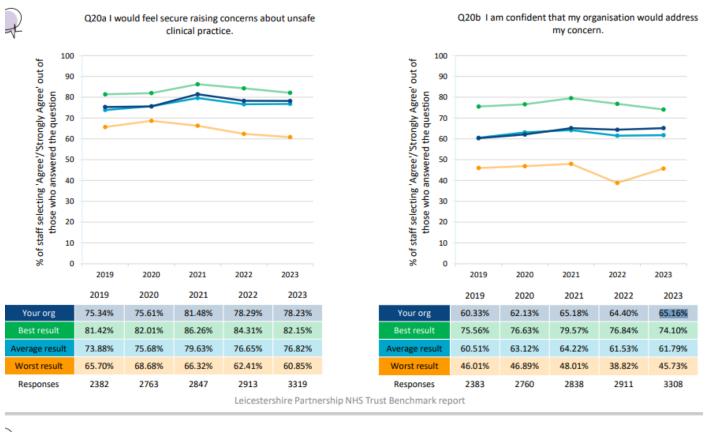
#### 2023 NHS Staff Survey responses to statements relating to raising concerns.

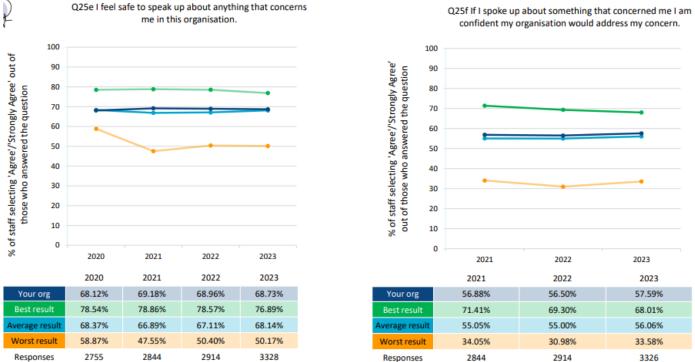
Question		2022	2023	Percentage difference
Q20a	I would feel secure raising concerns about unsafe clinical practice (Agree/Strongly agree).	78.5%	78.0%	-0.5%
Q20b	I am confident that my organisation would address my concern (Agree/Strongly agree).	64.3%	64.8%	0.5%
Q25e	I feel safe to speak up about anything that concerns me in this organisation (Agree/Strongly agree).	68.7%	68.7%	0.0%
Q25f	If I spoke up about something that concerned me, I am confident my organisation would address my concern (Agree/Strongly agree).	56.1%	57.2%	1.1%



# Freedom to Speak Up Staff Survey 2023: Benchmarking – against other similar trust:

The results are presented in the context of best, average, and worst outcomes for similar organizations. Data are weighted to enable fair comparisons between organisations.





Leicestershire Partnership NHS Trust Benchmark report

In summary, there is a slight reduction in the positive response to Question 20a and all other responses remain the same or show a slight improvement. This demonstrates that Leicestershire Partnership NHS Trust's speaking up ethos and the associated workstreams are continuing to make a positive impact on staff expectations of the



speaking up process and confidence in listening and following up, although there is still work to be done to make greater improvements. LPT is committed to fostering an inclusive culture where staff feel empowered to speak up and contribute to positive change, encouraging staff to voice their concerns, share their ideas and contribute to a safer, more transparent healthcare environment.

FTSU's are actively involved with the communications team and Trust Engagement Lead supporting culture cafes, and discussions on feedback into action highlighted from the most recent National Staff Survey and Pulse Surveys. They actively participate in all aspects of engagement to encourage staff to complete the staff survey including social media vlog's, supporting drop-in sessions and highlighting the importance of sharing their feedback for improvement through this confidential mechanism. This will continue into 2024-2025.

#### Freedom to Speak Up Guardian

Freedom to Speak Up Guardians continue to assist the Trust in developing a restorative and forward-thinking approach to addressing staff concerns based on reflective learning. In this regard, the service is well aligned with the trust's vision of "creating high-quality, compassionate care and wellbeing for all".

The FTSU team is tasked with raising awareness about speaking up and supporting the development of an open and transparent culture. The role of the FTSU Guardian is widely promoted through internal communication routes including the Trust's weekly eNews, monthly Team Brief and social media platforms, Trust-wide emails, posters across Trust sites, computer screen savers, face to face meetings and team presentations. The Trust's commitment to 'making speaking up business as usual' is also highlighted at all induction sessions for new staff, including corporate induction specifically for qualified and non-qualified staff, bank staff and volunteers. Bespoke presentations are delivered to medical trainees and students, nursing associates, apprentices, preceptors, international recruits and other Allied Health Professionals.

The FTSUGs meet monthly with the Chief Executive and Managing Director. A summary of raised concerns is discussed, as well as specific issues needing the attention of the senior leadership. In addition, the FTSU Guardian also meets quarterly with the Chair of the Trust Board, Chief Executive, and Non-Executive Director to exchange insights. The Guardian's report quarterly to Strategic Executive Board and the Quality and Safety Committee, and semi-annually and annually to the Trust Board. A report is also submitted annually to the Audit Committee.

## **Feedback on FTSU Service**

Upon closing a concern, feedback surveys are sent to staff members who have provided contact information. All feedback from surveys are confidential to the FTSU team or can be submitted anonymously. Any direct feedback is anonymised. The following feedback has been received:

- I contacted you a while ago. I know I did not give you my name which is why I have rung you again. I wanted to thank you for taking the things I told you seriously. I know you escalated my concerns because I saw immediate action from the senior leadership team. The matter was dealt with and hopefully my team can feel safe now. Thank you for your support.
- Smooth process and I felt well supported and informed throughout. I was made to feel that my concerns were valid, valued and understood.
- Just a short note to say thank you for your help and support regarding my issue. As you will see from the email below, the outcome has been positive. It is a reflection of what I always felt was right. It was the principle that mattered.
- You both do a fantastic job; your approach is just right and you are a huge asset to LPT.
- Thank you so much for listening today it really means a lot.

- It felt very strange as a senior manager having to call my freedom to speak up guardian but the compassion I received was brilliant. It was a really good opportunity for me to discuss my concern, to think about my next steps and to also feel validated that what I had experienced was not ok.
- FTSU has been very supportive and understanding and also they raised on timely manner and also been in touch and updated me and also cared by health and well being.
- FTSUG has provided what feels like a safe and respectful place to speak up and was swift to progress our concerns to relevant people. She did so in collaboration and discussion with us, carefully gauging what we would like to happen next and who to involve. Although the matter raised is far from being resolved FTSUG has been instrumental in supporting us to get to next steps and also in being able to reflect on wider impact on colleagues and the Trust as a whole in terms of recruitment and retention. This has served to validate concerns and restore some trust. FTSUG has remained clear regarding her role and sphere of influence. Many thanks!

# **Freedom to Speak Up Champions**

The Trust currently has 20 volunteer Freedom to Speak Up Champions (providing varying degrees of activity and engagement) who play an important role in positively promoting the key messages about speaking up and widening the reach of the FTSU agenda. Champions offer support and signpost colleagues to appropriate services as required. There has been a recent recruitment drive across the organisation through eNews and specific invitations to existing ambassador and champions networks including change leaders, health and wellbeing champions and cultural ambassadors. Unfortunately, recent uptake has been limited with individual time capacity reported as a potential barrier.

Given the national acknowledgment of additional barriers for speaking up amongst certain groups of staff, great care has been taken to ensure the Champions network is representative of the workforce in terms of equality, diversity and inclusion and professional groups. The Trust FTSU Champions network has representatives from staff support networks and from a variety of services and disciplines including physical health and mental health teams (both registered and unregistered clinicians), volunteers, Allied Health Professionals and administrative roles across the breadth of the workforce.

### Freedom to Speak Up Training.

There are additional eLearning training modules Speak Up, Listen Up, Follow Up that were developed in partnership by National Guardians Office and Health Education England. These are available through the Trust's local learning platform and are used as reference points across other Organisational Development programmes including Corporate Induction sessions, specific bespoke courses for line mangers and leadership forums and development activities. Currently the training is not mandatory but it is highlighted regularly through eNews bulletins, social media and Team brief as recommended personal development and an expectation of the National Guardian's Office and NHS England.

#### **FTSU Guardian Activity and Contacts**

**Table 1 –** Comparative summary of contacts from 2018 – 2024 inclusive.

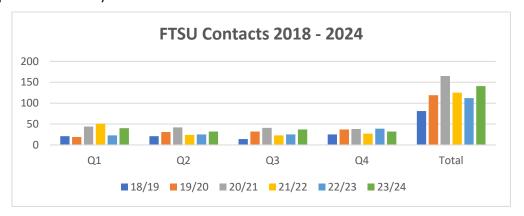


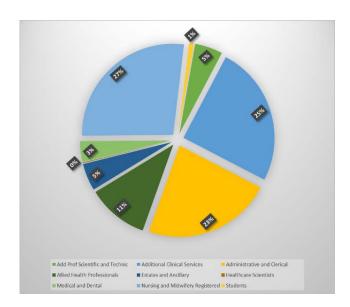
Table 2. Comparative Summary of Speaking Up Cases per Directorate

Service Area	Q1 2023/2024	Q2 2023/2024	Q3 2023/2024	Q4 2023/2024
DMH	10	18	12	9
CHS	9	5	4	10
Enabling	4	4	6	6
FYPC/LD	6	5	7	6
Hosted	1	0	8	1
TOTAL	40	22	27	22

There is a fairly level spread of contacts per Directorate across each year and where there appears to be a spike in Q2 a small group of staff spoke up together from Directorate of Mental Health which impact the figures.

On average, Community Mental Health Trusts reported 35.8 cases in each quarterly submission during 2023/2024 (NGO Culture is a Patient Safety Issue.) The table above shows that LPT average cases 35.25 for 2023/2024 which is in line with average reporting numbers of similar organisation type

Chart 1 and 2 – Comparison showing Professional Groups in LPT (Jan 2024) and FTSU Contacts (2023/2024)



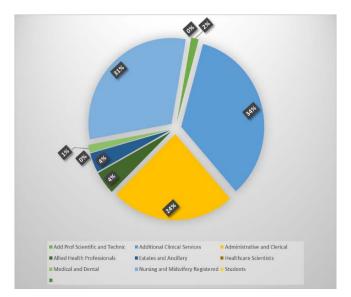
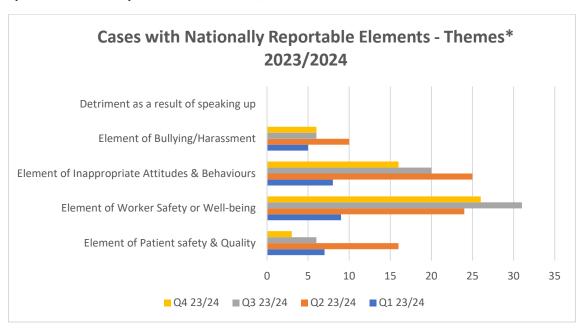


Chart 1 and 2 seek to show the breakdown of staff professional groups to compare whether the numbers of people that are speaking up correspond to the staff make-up for LPT as a whole.

The categories of Administration and Clerical, Additional Clinical Services and Registered Nursing and Midwifery are proportionally higher in the speaking up chart to the total staff ratio and the categories for Allied Health Professionals, Medical and Dental and Additional Professional, Scientific and Technical are proportionally lower. We will be doing more research into the data here and look at focussing on raising awareness across all the professional groups over the coming year.



Table 3 - Key Themes Quarterly breakdown for 2023/2024



<sup>\*</sup> Speak-up cases often contain multiple themes; therefore, data sets do not always equate together. Reports are recorded under the workers' description and in line with National Guardian Office Guidance.

Themes reported in quarterly data collection, are shared with the National Guardians Office, may include multiple aspects raised in the speak-up cases. Due to the nature of the FTSU Guardian role, individual staff members tend to speak up about specific cases, making it challenging to identify generalized themes within teams, departments, directorates, or across the entire organization.

# FTSUG Involvement and Case Management – General Summary.

The Freedom to Speak Up Guardian (FTSUG) dedicates time each week to review cases, follow up on actions taken, receive feedback, and collaborate closely with directorates. All concerns raised are recorded, with access restricted to guardians, ensuring an accurate and timely representation of the trust's responses and case management. The FTSUGs remain responsive to concerns raised at any time, ensuring timely and thorough responses. Communication with those who raise concerns is tailored to their unique needs, including face-to-face meetings for sensitive matters. Effective communication, building strong relationships, and maintaining visibility are foundational elements essential for the success of this process.

Attitudes and Behaviours, Bullying, Worker Wellbeing and Safety - FTSU Guardian's have observed that most common concerns across all directorates encompass elements of incivility, behaviours that are not consistent with our agreed trust leadership behaviours, as well as perceived microaggressions or bullying. This is highlighted in the larger number of cases from the category's attitudes and behaviours and worker wellbeing or safety. During the initial conversation, it often becomes apparent that staff identify the attitudes and behaviours that are apparent, in their view, and go on to describe how this impacts on them feeling unsafe or on their wellbeing. The increasing number of cases brought to the FTSU Guardian's which are then referred to HR to utilise of the Dispute Resolution in the Workplace Policy for informal early resolution has increased over the last 12 months. Feedback from contacts suggests that this may be creating some additional unintended barriers to speaking up. Matters raised in this category included

- Behaviours not in line with our leadership behaviours and values
- Case load management and burnout
- Lack of clarity on roles and responsibilities causing confusion and conflict



- Incivility, not respecting individual differences (protected characteristics) and bullying and discrimination
- Effects of perceived cliques, in and out groups and the potential for closed cultures.
- Feeling unsupported, lack of communication

These matters are regularly raised in various triangulation meetings and are being actively addressed through trustwide engagement events and leadership development initiatives. These include bespoke training sessions focusing on compassionate leadership for Band 7 and Band 8 colleagues, the inclusion of psychological safety in the OFOW priorities and the publication of the Post Incident Pathway for Staff Support and Zero Tolerance in the workplace.

Systems and Processes - The experience reported by some staff highlights some loss of staff confidence in the compassionate and consistent management of the formal policies, procedures and guidance. Matters raised in this category included -

- Information and support to review agenda for change banding.
- Secondment and acting up policies
- Study leave, equal opportunities, talent management and professional development opportunities
- Escalation procedures when MDT members are from differing organisations
- Data security and record keeping
- Flexible working, blended working and reasonable adjustments
- Pay processes and pay progression
- Supervision and appraisal

FTSU Guardians have also noted reports of the impact on colleagues when matters are taking longer to resolve/investigate often due to the causal effect of the matters raised or effects of sickness and planned leave. This information and further intelligence from staff speaking up is reported through to Human Resources channels and workforce meetings to ensure this is considered as feedback and used in future policy reviews.

Patient Safety and Quality - There were 32 contacts during 2023/2024 that included an element of concern relating to patient safety. In these cases, the FTSUG ensures that relevant directors and senior leaders are informed, and they take the lead on reviewing these matters. When appropriate the concerns are escalated to the patient safety team for information and triangulated through existing surveillance mechanisms. Staff are always advised to complete an eIRF or contact the Safeguarding team as appropriate. Feedback, especially regarding inpatient wards and community nursing services, is gathered either openly or confidentially and then utilized to inform Quality and Safety summits, paving the way for future actions. Matters raised in this category included –

- Case load management and burnout individual's capacity and level of resilience
- Waiting lists and staffing pressures
- Cultures affected by perceived micro-management, variation in practice, professional support (local induction and quality of handover).
- Working with social care colleagues and recognising individual roles and responsibilities when working with patients with complex needs.
- Escalation routes to support best practice across the diverse team.
- Consistency and understanding of the care offer as part of team approach.
- Differences in what constitutes best practice and how to resolve these differences constructively.
- Learning from incidents

Where wider patient care matters are raised, listening meetings are often facilitated with a member of the senior leadership team to ensure staff feel they are listened to and that their concern will be considered and responded to. These matters are often complex in their context and content. However, generally following a review or investigation



of the individual matters the leadership team offer support to the clinical teams to make changes as a result of learning and not blaming. This has included communication or additional training regarding best practice, updating procedural guidance and cascading to teams to share learning, facilitated engagement events to support collaboration and team communication.

#### **Future Actions**

- Prepare for October Speak Up Month paying close attention to working collaboratively both internally across
  a variety of engagement events and externally with LLR ICB partners to raise awareness of speaking up.
- FTSU Guardian to continue to triangulate information with key stakeholders Including EDI Service, HR,
  Organisational Development Lead, Patient Experience Team, Patient Safety Team, Surveillance Leads, and
  workforce metrics to establish common themes and share learning.
- FTSU Guardian to continue to work with the Equality, Diversity and Inclusion Lead, Organisational Development Lead, Health and Wellbeing Lead, People Promise practitioners and Communications lead to support staff engagement, wellbeing and development a positive speaking up culture.
- To work closely with OD team to link with the "Our Future, Our Way" culture, work supporting change leaders, particularly with regards to the priority of 'psychological safety'.
- To work collaboratively with ICB partners to share best practice and embed FTSU ethos across the LLR Group.
- Continue to work with Northamptonshire Hospitals NHS Foundation Trust partners to share best practice, develop and deliver shared strategy for FTSU.

# National Guardian Office (NGO) updates (2023 – 2024)

**Guidance for Integrated Care Boards** - In June 2023 The National Guardian's Office and NHS England <u>published</u> <u>guidance</u> for Integrated Care Boards to ensure speaking up routes are available for their own ICB staff and their primary care workers across the ICS. ICBs were asked to also consider how they will gain assurance that all NHS organisations across the ICS have accessible speaking up arrangements.

**Fear and Futility Report** - In June 2023 the NGO published <u>Fear and Futility</u> – What does the Staff Survey tell us about speaking up in the NHS? The report summarises the national picture –

The national picture which the Staff Survey results paints is that the confidence workers feel to speak up has declined for the second year in a row. The four questions which make up the Freedom to Speak Up sub-score can be mapped against two key barriers to speaking up:

- 1. the fear of detriment, that speaking up is a risky thing to do (questions 19a and 23e); and
- 2. the belief that speaking up is futile that nothing will happen as a result (questions 19b and 23f)

If people fear that speaking up may lead to retaliation or threaten their job, they may stay quiet when they see matters which need addressing, and things that could have been resolved at an early stage could potentially lead to harm. If people believe that nothing will be done if they raise a matter, then speaking up is futile and not worth the risk.

In July 2023 the NGO published "I felt heard for the first time" – A summary of Speaking Up to Freedom to Speak Up Guardians. This report summarises the cases raised with Freedom to Speak Up guardians from 1 April 2022 to 31 March 2023.

In 2022/23, a record number of cases have been raised highlighting the incredible pressures on the healthcare system. People have spoken up about system pressures, in particular staffing levels and the impact this is having on wellbeing as well as other issues including incivility between colleagues, and patient safety concerns.

These are some of the questions that leaders need to ask. Why do some workers speak up anonymously? Why are workers fearing or experiencing detriment? How is bullying and harassment being addressed?



Speak Up Month – October 2023 – Breaking Barriers - Dr Jayne Chidgey Clarke – National Freedom to Speak Up Guardian presented a Leadership Masterclass as part of the local celebration for Speak Up month. This provided an opportunity to publicise speaking up across the organisation and engage with the Organisational Development (OD) work stream. The session included specific reference to the main barriers to speaking up (fear and futility) as highlighted in the 2022 National Staff Survey. Breaking barriers remains a key theme underpinning the future work of the FTSUG's in collaboration with the Equality, Diversity and Inclusion Team, and Staff Support Networks.

National Guardians Office Annual Report - In November 2023 the <u>Annual Report</u> of the National Guardian for the NHS was laid before Parliament, highlighting the work of FTSUG's and the National Guardians Office. The report also shares learning which indicates that more work is needed for speaking up to be described as business as usual in the healthcare sector in England. The report features case studies from across England, illustrating the difference Freedom to Speak Up guardians are making and examples of how healthcare workers are being supported to speak up for patient safety and worker wellbeing.

Freedom to Speak Up Champions Guidance for Freedom to Speak Up Guardians – published November 2023 The NGO recommends a clear distinction between the roles of the Champion and Guardian and that "only FTSU Guardian's, having received National Guardian's Office training and registered on the NGO's public directory, should handle [speaking up] cases".

**Recording Cases and Reporting Data** - Updated guidance on <u>Recording cases and Reporting Data</u> to be implemented from April 2024. This document updates previous guidance and provides comprehensive guidance to assist FTSU guardians in accurately recording cases and consistently reporting case data to the National Guardian's Office. FTSU guardians are required to record all cases of speaking up that are raised with them. The NGO collects data about the speaking up cases brought to FTSU guardians, to inform our understanding of themes and trends in speaking up.

**Settlement agreements and confidentiality clauses -** NHS Employers, with legal input from Capsticks LLP, has updated its <u>employer guidance</u> on the use of settlement agreements and confidentiality clauses when resolving a workplace dispute or ending an employment contract.

The updated guidance published in May 2024 includes a section called "Freedom to Speak Up and Settlement Agreements" highlighting the requirement for all NHS providers to include an express carve-out clause which makes it clear in any contract or agreement that a worker cannot waive their rights to speak up about or disclose any issue which would be a protected disclosure under current law.

# **Recommendations:** The Board is asked to:

- 1. Confirm assurance that issues of concern are being raised and dealt with in line with the Freedom to Speak Up: Speak Up, Listen Up, Follow Up policy and that the Board is aware of themes and trends emerging in the organisation.
- 2. Confirm assurance that the work of the FTSUG's is supporting LPT to develop an open and transparent culture where staff are actively encouraged and enabled to speak up.
- 3. Confirm they are assured that the Trust has a policy and process in place for staff to safely raise concerns and as a consequence ensure action is taken on any themes emerging or areas of concern with feedback provided to those raising concerns.
- 4. Promote the demonstration of learning through open communication, addressing detriments, and fostering collaboration within the organization on all matters related to speaking up.

Presenting Director: Angela Hillery

Author(s): Chris Moyo

Pauline Lewitt Date: 24/07/24



# **Governance table**

For Board and Board Committees:	Trust Board		
Paper sponsored by:	Angela Hillery, CEO		
Paper authored by:	Pauline Lewitt and Chris Moyo: Freedom to Speak Up Guardian(s)		
Date submitted:	24/07/2024		
State which Board Committee or other forum	N/A		
within the Trust's governance structure, if any,			
have previously considered the report/this issue			
and the date of the relevant meeting(s):			
If considered elsewhere, state the level of	N/A		
assurance gained by the Board Committee or			
other forum i.e. assured/partially assured / not			
assured:	Annual		
State whether this is a 'one off' report or, if not,	Annual		
when an update report will be provided for the purposes of corporate Agenda planning			
STEP up to GREAT strategic alignment*:	High <b>S</b> tandards	Yes	
STEE up to GREAT Strategic anginitent.	Transformation		
	Environments		
	Patient Experience & Involvement		
	Well <b>G</b> overned		
	Reaching Out		
	Equality, Leadership,	Yes	
	Culture		
	Access to Services		
	<b>T</b> rustwide Quality	Yes	
	Improvement		
Organisational Risk Register considerations:	List risk number and title	N/A	
	of risk		
Is the decision required consistent with LPT's risk	N/A		
appetite:			
False and misleading information (FOMI)	None		
considerations:	Confirmed		
Positive confirmation that the content does not risk the safety of patients or the public	Confirmed		
Equality considerations:	None		
Equality considerations:	Notice		